

Mars Khaimov Law, PLLC

VIA ECF

Honorable Magistrate Sarah L. Cave United States District Magistrate Judge Southern District of New York 500 Pearl Street New York, NY 10007

23-cv-01073-JHR-SLOPIAMENT STEQUEST AT ECT NO. 14 15 GRANTED IN PART. The inperson initial case management conference ("ICMC") scheduled for June 16, 2023 at 10:00 a.m. (ECF No. 12) will now proceed by telephone. The parties are directed to call: (866) 390-1828; access code: 380-9799, at the scheduled time.

> At the conference, the parties shall be prepared to discuss the subjects set forth in Fed. R. Civ. P. 16(b) and (c), Defendant's request to bifurcate discovery, and the parties' availability for a settlement conference with the Court.

The Clerk of Court is respectfully directed to close ECF No. 14.

SO ORDERED. 6.8.2023

Re: Case 1:23-cv-01073-JHR-SLC Toro v. Kagan Professional Development, Inc. Request for Adjournment of Conference

Dear Judge Cave:

Plaintiff submits this letter-motion respectfully to request that the currently scheduled inperson conference for June 16, 2023 be converted to a remote telephonic conference, or, in the alternative, a one-week adjournment be granted. Plaintiff's Counsel will be out of the country during the week of June 12, 2023 but will be back by June 23, 2023. Counsel is available to appear via telephone on June 16, 2023. If the Court intends on holding the conference in-person, Counsel requests a date of June 23, 2023 for the appearance, or a date more convenient to the Court. This is the first time this relief is being requested. Defense counsel has consented to this request.

We thank the Court for its attention and consideration in this matter.

Respectfully submitted,

Mars Khaimov, Esq. Attorney for Plaintiff

Cc: all counsel of record

